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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PENDLETON DIVISION

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OREGON FIREARMS FEDERATION, )  
INC., et al., )  
Plaintiffs, ) Civil No.  
v. ) 2:22-cv-01815-IM  
(Lead Case)  
TINA KOTEK, et al., ) Civil No.  
Defendants. ) 3:22-cv-01859-IM  
(Trailing Case)  
(Continued) ) Civil No.  
 ) 3:22-cv-01862-IM  
(Trailing Case)  
 ) Civil No.  
 ) 3:22-cv-01869-IM  
(Trailing Case)  
)

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\* VIDEOCONFERENCE \*

DEPOSITION UPON ORAL EXAMINATION

OF EXPERT

LOUIS J. KLAREVAS

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Witness located in:  
Oyster Bay, New York

\* All participants appeared via videoconference \*

DATE TAKEN: March 24, 2023  
REPORTED BY: Tia B. Reidt, Washington RPR, CCR #2798  
Oregon # 22-0001

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1 (continued)

2 MARK FITZ, et al.,

3 Plaintiffs,

4 v.

5 ELLEN F. ROSENBLUM, et al.,

6 Defendants.

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8 KATERINA B. EYRE, et al.,

9 Plaintiffs,

10 v.

11 ELLEN F. ROSENBLUM, et al.,

12 Defendants.

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13 DANIEL AZZOPARDI, et al.,

14 Plaintiffs,

15 v.

16 ELLEN F. ROSENBLUM, et al.,

17 Defendants.

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1 APPEARANCES

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1       Q. So in terms of the plaintiffs who are involved  
2 here, do you know anything about the National Shooting  
3 Sports Foundation?

4       A. The National Sports Shooting Foundation [sic]  
5 is a plaintiff in this case?

6       Q. Yep.

7       A. I did not -- I did not know that.

8                   Sorry, can I ask which -- because this is four  
9 consolidated cases, which is the case that involves the  
10 National --

11       Q. The National Shooting Sports Foundation --

12       A. Yeah.

13       Q. -- that's the prior plaintiff, and then -- I  
14 think there's a gun store involved, and then the  
15 National Shooting Sports Foundation.

16       A. That's -- yeah, sorry. I don't mean to cut  
17 you off.

18                   Yeah, I did not realize that. I guess I  
19 should have looked fully at the list of plaintiffs.

20       Q. Yeah.

21       A. Yeah, I didn't know that, no.

22       Q. Do you know anything about that organization?

23       A. I do. I've actually cited their reports and  
24 the declaration of their former I think research  
25 director has been cited in some of my -- I don't know

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1 if it was this case, but it's been cited in certainly  
2 other declarations that I've done.

3 Q. And the citation to their data was for what  
4 reason?

5 A. In terms of AR and AK platform rifles that are  
6 in circulation in the United States among civilians and  
7 the kind of ownership patterns of those rifles.

8 Q. Oh, so the national sales data that they  
9 track? Is that what you mean?

10 A. So they don't -- good question. So they don't  
11 track necessarily national sales data on AR and AK  
12 platform rifles. What they do track are two things,  
13 and it's done in two kind of separate reports. One is  
14 kind of ownership patterns: Who's buying AR and AK  
15 platform rifles, why are they buying them, what is  
16 their -- you know -- you know, what -- in what -- like  
17 what is the ownership rates per owner. And by that, I  
18 mean, like, do they own one, do they own two, do they  
19 own more than two. So that's one kind of set of  
20 reports that --

21 And if I can call it the NSSF to make it  
22 simpler?

23 Q. Yeah.

24 A. Yeah, so that's one set of reports that the  
25 NSSF has put out. And it's appeared in -- that kind of

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## C E R T I F I C A T E

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3 STATE OF WASHINGTON

4 COUNTY OF PIERCE

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6 I, Tia Reidt, a Certified Court Reporter in and  
7 for the State of Washington, do hereby certify that the  
8 foregoing transcript of the deposition of LOUIS J.  
9 KLAREVAS, having been duly sworn, on March 24, 2023, is  
10 true and accurate to the best of my knowledge, skill and  
11 ability. Reading and signing was requested pursuant to  
12 FRCP Rule 30(e).

13 IN WITNESS WHEREOF, I have hereunto set my hand  
14 and seal this 28th day of March, 2023.

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/S/ Tia B. Reidt  
Tia B. Reidt, RPR, CCR 22-0001  
NOTARY PUBLIC, State of  
Washington.  
My commission expires  
5/15/2026.

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